

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

THE SOUTH CAROLINA STATE )  
CONFERENCE OF THE NAACP and )  
TAIWAN SCOTT, on behalf of himself )  
and all other similarly situated persons, )

Plaintiffs, )

vs. )

HENRY D. MCMASTER, in his official )  
capacity as Governor of South Carolina; )  
HARVEY PEELER, in his official )  
capacity as President of the Senate; )  
LUKE A. RANKIN, in his official )  
capacity as Chairman of the Senate )  
Judiciary Committee; JAMES H. )  
LUCAS, in his official capacity as )  
Speaker of the House of )  
Representatives; CHRIS MURPHY, in )  
his official capacity as Chairman of the )  
House of Representatives Judiciary )  
Committee; WALLACE H. JORDAN, )  
in his official capacity as Chairman of )  
the House of Representatives Election )  
Law Subcommittee; HOWARD )  
KNABB, in his official capacity as )  
interim Executive Director of the South )  
Carolina State Election Commission, )  
JOHN WELLS, JOANNE DAY, )  
CLIFFORD J. ELDER, LINDA )  
MCCALL and SCOTT MOSELEY, in )  
their official capacities as members of )  
the South Carolina State Election )  
Commission, )

Defendants.

Civil Action No.: 3:21-cv-03302-JMC

**MOTION IN SUPPORT OF**  
**PRO HAC VICE APPLICATION**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that **John M. Gore** be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).  
☐ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose  
☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):  

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☐ No duty of consultation is required because the opposing party is proceeding pro se.

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s/Robert E. Tyson, Jr.  
Robert E. Tyson, Jr.  
Local Counsel for: Senate Defendants Harvey  
Peeler and Luke A. Rankin  
District of South Carolina  
Federal Bar Number: 7815

revised 09/19/05